

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE BENCHMARK  
RATES ANTITRUST LITIGATION

No. 1:13-cv-07789-LGS

**NOTICE OF MOTION FOR ISSUANCE OF A HAGUE CONVENTION REQUEST FOR  
INTERNATIONAL JUDICIAL ASSISTANCE TO TAKE TESTIMONY OVERSEAS**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Declaration of Christopher M. Burke, dated August 9, 2019 (the “Burke Declaration”), Plaintiffs respectfully move this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on such date and at such time as the Court may direct, to issue a Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (“Letter of Request”) to take testimony overseas, pursuant to 28 U.S.C. §1781, Federal Rule of Civil Procedure 28(b), and Chapter I of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, T.I.A.S. No. 7444, 23 U.S.T. 2555. The proposed Letter of Request is attached as Exhibit A to the Burke Declaration.

A Proposed Order is attached to this Notice of Motion.

Dated: August 9, 2019

Respectfully submitted,

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s/ Christopher M. Burke

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

Dated: August 9, 2019

s/ Christopher M. Burke  
Christopher M. Burke